

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
By: DT  
Deputy

**Case No: EP:24-CR-00699-KC**

**Defendant.**

## INDICTMENT

**CT 1: 18:956(a)(1) – Conspiracy to Kill in a Foreign Country**

## THE GRAND JURY CHARGES:

**COUNT ONE**

**Conspiracy to Kill In a Foreign Country**  
(18 U.S.C. § 956(a)(1))

Beginning on or about December 28, 2024, and continuing through and including on or about January 3, 2024, both dates being approximate and inclusive, within in the Western District of Texas and elsewhere, Defendant,

**ALEXIS MALDONADO-MUNOZ**  
**a.k.a. Tarzan,**

together with others known and unknown to the Grand Jury, did knowingly and intentionally conspire to commit outside the United States, that is, the Republic of Mexico, an act that would constitute the offense of murder if committed in the special maritime and territorial jurisdiction of the United States, by shooting and murdering E.G.R. as authorized by another co-conspirator within the United States.


All in violation of Title 18, United States Code, Section 956(a)(1).

A TRUE BILL.

FOREPERSON OF THE GRAND JURY

JAIME ESPARZA  
UNITED STATES ATTORNEY

BY:

  
Assistant U.S. Attorney